

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JUSTICE FOR THE NEXT GENERATION,  
*et al.*,

*Plaintiffs,*

v.

**Case No.: 1:20-CV-00998-CCE-LPA**

TERRY JOHNSON, individually and in  
his official capacity as Alamance County  
Sheriff, *et al.*,

*Defendants*

**DECLARATION OF ALLISON JOELLE HARVILL**

I, Allison Joelle Harvill, pursuant to 28 U.S.C. § 1746, hereby declare as follows”

1. I am over eighteen years of age and make this declaration on personal knowledge. If called as a witness, I could and would testify competently to the matters set for herein.

2. I am an attorney at Envisage Law. As part of my employment, I reviewed and analyzed discovery production in this lawsuit. As part of this analysis, I reviewed discovery production for responsiveness to production requests and for relevance. I also assisted with downloading Plaintiffs’ productions into our litigation discovery database.

3. I evaluated the various files Plaintiffs produced to ascertain the types of files and page numbers in Plaintiffs’ production. I compiled the chart attached hereto as Exhibit 1 based on my review of the files produced by the parties in this case.

4. As part of my review, I discovered that many of the video files produced by Plaintiff were duplicates of files produced earlier by Defendants.

5. Sixteen video files in Plaintiffs' second production were videos produced by the City of Graham Defendants in their first production on September 30, 2021. Those sixteen video files are part of the seventy video files that were duplicated from Plaintiffs' second production and reproduced in Plaintiffs' third production. This information is summarized in Exhibit 1.

6. As part of my analysis, I reviewed Plaintiffs' production for documents that Plaintiffs indicate originated from one of the Plaintiffs, such as communications. I excluded from my search criteria documents that originated with Defendants, such as policy manuals written by Alamance County or the City of Graham.

7. Plaintiffs' first production used the field "Custodians" to indicate from whom a document originated. Plaintiffs' second and third production used the field "Party" to indicate from whom a document originated.

8. My search yielded four documents produced by the Plaintiffs that originated from Plaintiffs. They are as follows:

- a. Letter dated October 8, 2020, from Rev. Gregory B. Drumwright to Chief Cole and the Graham Police Department sharing plans for "I Am Change March to the Polls," (hereinafter "Letter 1").
- b. Letter date October 26, 2020, from Rev. Drumwright to Chief Cole concerning meeting on Tuesday, October 20, 2020.
- c. Letter dated October 27, 2020, from Chief Cole to Rev. Drumwright in response to Letter 1 and meeting on Tuesday, October 20, 2020.

- d. Application for a Historic Courthouse Facility Reservation Permit dated October 10, 20, 2020, signed by Rev. Greg Drumwright.

As of the date of this declaration, my searching has not yielded any other documents originating with Plaintiffs.

I hereby declare under penalty of perjury that the foregoing Declaration is true and accurate base on my personal knowledge.



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Allison Joelle. Harvill

# EXHIBIT 1

SUMMARY OF PRODUCTION BY PARTIES		
Plaintiff's Production 1		
	107	Files
	591	Pages*
	15	Documents
	4	Documents with Plaintiff listed as "Custodian"
	56	Pictures
	36	Videos
	24GB	Size of File
Plaintiff's Production 2		
	172	Files***
	171	Pages
	28	Pictures
	144	Videos
	61.8 GB	Size of File
Plaintiff's Production 3		
	534	Files
	534	Pages
	456	Pictures
	78	Videos
	70	Videos previously produced in Plaintiff's 2 <sup>nd</sup> Production
	16	Video of these videos were produced in the Graham Defendant's first production
	64.5 GB	File Size
Graham's Production 9/30		
	1987	Files
	12935	Pages
	795	Pictures
	59	Videos
	102.9GB	File Size
Grahams Production 11/2		
	308	Files
	1267	Pages
	12	Pictures
	0	Videos
	308 MB	File Size

ACSO Production w/o Bates		
	981	Files
	1351	Pages
	713	Pictures
	150	Videos
	40.34GB	File Size
ACSO Production w/ Bates		
	565	Files
	1073	Pages
	284	Pictures
	138	Videos
	52.53GB	File Size
* Pages includes documents, video placeholders, pictures, screen shots of tweets.		
** Plaintiff's production includes a file without a Bates number.		